

## EXHIBIT E

## ATTORNEY COMMUNICATION

Begin forwarded message:

**From:** Gary Yamaguchi <[gyamaguchi@inscitech.com](mailto:gyamaguchi@inscitech.com)>  
**Date:** June 9, 2019 at 10:55:01 PM PDT  
**To:** Elaine chiu <[erdoc1818@gmail.com](mailto:erdoc1818@gmail.com)>, Elaine Chiu <[echiu@inscitech.com](mailto:echiu@inscitech.com)>  
**Subject:** FW: Lopez v City of New York

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**From:** Gary Yamaguchi  
**Sent:** Wednesday, November 15, 2017 2:58 PM  
**To:** Elaine Chiu <[echiu@inscitech.com](mailto:echiu@inscitech.com)>  
**Subject:** Lopez v City of New York

Hi Elaine,

I have looked through the materials, and have a few questions:

1. How high was the bridge measured to be?
2. How high was the railing above the walkway surface of the bridge?
3. Did Mr. Lopez actually touch or hold onto a tree branch on the way down?

As I understand it, I am to determine if he was pushed over the railing, or if he jumped over the railing.

Gary

## ATTORNEY COMMUNICATION

**From:** Gary Yamaguchi <[gyamaguchi@inscitech.com](mailto:gyamaguchi@inscitech.com)>  
**Date:** June 9, 2019 at 10:54:00 PM PDT  
**To:** Elaine chiu <[erdoc1818@gmail.com](mailto:erdoc1818@gmail.com)>, Elaine Chiu <[echiu@inscitech.com](mailto:echiu@inscitech.com)>  
**Subject:** FW: 7702 Lopez v City of New York

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**From:** Gary Yamaguchi <[gyamaguchi@inscitech.com](mailto:gyamaguchi@inscitech.com)>  
**Sent:** Wednesday, December 27, 2017 10:31 AM  
**To:** Elaine Chiu <[echiu@inscitech.com](mailto:echiu@inscitech.com)>  
**Subject:** Re: 7702 Lopez v City of New York

I am in this week, today through Friday

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**From:** Elaine Chiu  
**Sent:** Friday, December 22, 2017 1:56:53 PM  
**To:** Gary Yamaguchi  
**Subject:** Re: 7702 Lopez v City of New York

I'm going to meet someone to go for dog walk.

Can I call you around 3?

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**From:** Gary Yamaguchi  
**Sent:** Friday, December 22, 2017 10:07:42 AM  
**To:** Elaine Chiu  
**Subject:** Re: 7702 Lopez v City of New York

I am here pretty much all day. Have to drive my wife somewhere first in a few minutes.

Gary T. Yamaguchi, Ph.D., P.E.  
InSciTech, Inc.

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**From:** Elaine Chiu

**Sent:** Thursday, December 21, 2017 10:06:00 PM

**To:** Gary Yamaguchi

**Subject:** Re: 7702 Lopez v City of New York

Chat tomorrow? What time works for you?

On Dec 21, 2017, at 5:16 PM, Gary Yamaguchi <[gyamaguchi@inscitech.com](mailto:gyamaguchi@inscitech.com)> wrote:

Elaine --

I am ready to discuss this case with you, when ever you are ready!

Gary

ATTORNEY COMMUNICATION

Begin forwarded message:

**From:** Gary Yamaguchi <[gyamaguchi@inscitech.com](mailto:gyamaguchi@inscitech.com)>  
**Date:** June 9, 2019 at 10:53:37 PM PDT  
**To:** Elaine chiu <[erdoc1818@gmail.com](mailto:erdoc1818@gmail.com)>, Elaine Chiu <[echiu@inscitech.com](mailto:echiu@inscitech.com)>  
**Subject:** FW: 7702 Lopez v New York

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**From:** Gary Yamaguchi  
**Sent:** Friday, January 5, 2018 1:24 PM  
**To:** Elaine Chiu <[echiu@inscitech.com](mailto:echiu@inscitech.com)>  
**Subject:** 7702 Lopez v New York

Hi Elaine!

We didn't get to talk about this case. However, after looking at the documents and photographs, I do not believe biomechanics is helpful, as:

- Drop is long enough to rotate 180 deg and fall head down at impact;
- Presence of trees, statement that he tried to grab a tree branch, and presence of multiple things to snag body parts on the way down such as branches, ivy, etc. makes it difficult to determine if he could have been pushed over the railing versus jumping over the railing.
- If it were a clean drop to the ground with no interference from other objects contacted as he departed from the bridge, or on the way down, I then could do something regarding the width of the railing, the ability to apply torques to the body with a narrow railing, etc. Once he touches something on the way down, all bets are off.

Hope this helps. I billed 1 hour, I believe. You can take it off if you like.

Gary

Gary T. Yamaguchi, Ph.D., P.E.

<http://www.InSciTech.com>  
2517 East Rocky Slope Drive  
Phoenix, AZ 85048  
480-747-8310

## ATTORNEY COMMUNICATION

Begin forwarded message:

**From:** Gary Yamaguchi <[gyamaguchi@inscitech.com](mailto:gyamaguchi@inscitech.com)>  
**Date:** June 9, 2019 at 10:51:52 PM PDT  
**To:** Elaine chiu <[erdoc1818@gmail.com](mailto:erdoc1818@gmail.com)>, Elaine Chiu <[echiu@inscitech.com](mailto:echiu@inscitech.com)>  
**Subject:** FW: Lopez - expert invoice

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**From:** Gary Yamaguchi  
**Sent:** Tuesday, August 28, 2018 5:32 PM  
**To:** Janis Haussler <[jhaussler@inscitech.com](mailto:jhaussler@inscitech.com)>  
**Cc:** Elaine Chiu <[echiu@inscitech.com](mailto:echiu@inscitech.com)>  
**Subject:** Re: Lopez - expert invoice

Oh, OK, yes I did do a little analysis of it. But wasn't able to help Elaine much.

Gary T. Yamaguchi, Ph.D., P.E.  
InSciTech, Inc.

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**From:** Janis Haussler  
**Sent:** Tuesday, August 28, 2018 2:18:00 PM  
**To:** Gary Yamaguchi  
**Cc:** Elaine Chiu  
**Subject:** RE: Lopez - expert invoice

Hi Gary,

Maybe this will jog your memory, as it's been a while. This is the statement and invoices I sent to Ms. Kuan earlier today.

Thanks,



Janis

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**From:** Gary Yamaguchi  
**Sent:** Tuesday, August 28, 2018 11:09 AM  
**To:** Elaine Chiu <[echiu@inscitech.com](mailto:echiu@inscitech.com)>; Janis Haussler <[jhaussler@inscitech.com](mailto:jhaussler@inscitech.com)>  
**Subject:** Re: Lopez - expert invoice

Hi Janice and Elaine,

I am concerned as I have not heard about this case until now. What is it about? What do you need me to do?

Gary T. Yamaguchi, Ph.D., P.E.  
InSciTech, Inc.

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**From:** Janis Haussler  
**Sent:** Tuesday, August 28, 2018 9:44:52 AM  
**To:** Elaine Chiu  
**Cc:** Gary Yamaguchi  
**Subject:** FW: Lopez - expert invoice

Good Morning!

My e-mail statements and invoices to Ms. Kuan have been returned undeliverable. I was finally able to contact her this morning regarding the past due invoices. She is concerned that you have not been in touch with her for some time and the invoices are for work that was done by someone other than you! She states the case is still active and she would like for you to contact her to discuss a "thumb drive that she sent with material on it".

Her correct contact information is below.

Thanks!

Janis

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**From:** Julia Kuan <[Julia.Kuan@romanoandkuan.com](mailto:Julia.Kuan@romanoandkuan.com)>  
**Sent:** Tuesday, August 28, 2018 9:34 AM  
**To:** Janis Haussler <[jhaussler@inscitech.com](mailto:jhaussler@inscitech.com)>  
**Cc:** Tirek Gayle <[tgayle@ecbalaw.com](mailto:tgayle@ecbalaw.com)>; Ali Frick <[africk@ecbalaw.com](mailto:africk@ecbalaw.com)>  
**Subject:** Lopez - expert invoice

Hi Janice,  
Can you send us the invoice here? We would like to have a consult phone call with Dr. Chu and Dr. Yamaguchi next week, if possible. Thanks.

Julia P. Kuan, Esq.  
Romano & Kuan, PLLC  
600 Fifth Avenue, 10<sup>th</sup> Floor  
New York, N.Y. 10020  
(212) 763-5075  
[Julia.kuan@romanoandkuan.com](mailto:Julia.kuan@romanoandkuan.com)